

**United States Bankruptcy Court**  
**Northern District of Illinois, Eastern Division**

IN RE: Farooq Patel	)	Chapter 13
	)	Case No. 16 B 06933
Debtor(s)	)	Judge Pamela S. Hollis

**Notice of Motion**

Farooq Patel  
5141 N. Bernard  
Chicago, IL 60625

Debtor Attorney: Sulaiman Law Group Ltd  
via Clerk's ECF noticing procedures

On April 27, 2016 at 10:30 am, I will appear at the location listed to the right, and present this motion.

- > Dirksen Federal Building
- > 219 South Dearborn
- > Courtroom 644
- > Chicago, IL 60604

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Wednesday, April 20, 2016.

/s/ MARILYN O. MARSHALL  
MARILYN O. MARSHALL, TRUSTEE

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**Motion to Dismiss Case For Unreasonable Delay**

Comes now Marilyn O. Marshall, Standing Trustee, and requests that this case be dismissed, as Debtor(s) failed to file the required documents pursuant to 11 USC §521, §1307, §349, and Rule 3015, and in support thereof states the following:

1. Debtor(s) filed for Chapter 13 on 02/29/2016.
2. The debtor(s) have failed to provide an Affidavit of Compliance.
3. The debtor(s) have failed to begin payments within thirty days of filing the plan as required under 11 U.S.C. §1326(a) (1).
4. The debtor(s) have failed to amend the means test to correct improper deductions or to provide requested and required proof thereof.
5. The debtor(s) have failed to commit all disposable income to the plan.
6. The debtor has failed to amend Schedule I to disclose bartending income.
7. The debtor has no basis to pay Max Digital, LLC as a special class unsecured creditor.
8. The debtor's failure to confirm a plan in a timely manner constitutes unreasonable delay.

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this court deems just and proper.

Office of the Chapter 13 Trustee  
224 S Michigan Ave  
Ste 800  
Chicago, IL 60604  
(312) 431-1300

/s/ MARILYN O. MARSHALL  
MARILYN O. MARSHALL, TRUSTEE